

Michael Lacovara (209279)
 michael.lacovara@freshfields.com
 FRESHFIELDS BRUCKHAUS DERINGER US LLP
 601 Lexington Ave., 31st Floor
 New York, NY 10022
 Telephone: 212 277 4000
 Facsimile: 212 277 4001

Terry Calvani (53260)
 terry.calvani@freshfields.com
 Richard Snyder (*pro hac vice*)
 richard.snyder@freshfields.com
 Christine Laciak (*pro hac vice*)
 christine.laciak@freshfields.com
 FRESHFIELDS BRUCKHAUS DERINGER US LLP
 700 13th Street, NW, 10th Floor
 Washington, DC 20005-3960
 Telephone: 202 777 4500
 Facsimile: 202 777 4555

*Counsel for Defendant Beijing Matsushita
 Color CRT Co., Ltd.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Case No. 3:07-cv-5944 SC, MDL No. 1917

This document relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
 No. 11-cv-05513;

*Target Corp. v. Chunghwa Picture Tubes, Ltd.,
 et al.*, No. 11-cv-05514;

Tech Data Corp., et al. v. Hitachi, Ltd., et al.,
 No. 13-cv-00157;

*ViewSonic Corp. v. Chunghwa Picture Tubes,
 Ltd., et al.*, No. 14-cv-02510.

**DECLARATION OF RICHARD S.
 SNYDER IN SUPPORT OF
 DEFENDANT BEIJING MATSUSHITA
 COLOR CRT CO., LTD.'S
 ADMINISTRATIVE MOTION TO
 FILE DOCUMENTS UNDER SEAL
 PURSUANT TO CIVIL LOCAL
 RULES 7-11 AND 79-5**

1 I, Richard S. Snyder, do declare and state as follows:

2 1. I am Counsel with the law firm of Freshfields Bruckhaus Deringer US LLP,
3 counsel of record for defendant Beijing Matsushita Color CRT Co., Ltd. (**BMCC**) in the above-
4 captioned litigation .

5 2. I am a member of the Bars of the Commonwealth of Virginia and the District of
6 Columbia and am admitted to practice before this Court *pro hac vice*. I have personal knowledge
7 of the facts stated herein and, if called as a witness, I could and would competently testify thereto.

8 3. On November 7, 2014, BMCC filed its Motion to Dismiss Under Rule 12(b)(2)
9 and Motion for Summary Judgment Under Rule 56 for Lack of Personal Jurisdiction (**Motion**).
10 Filed contemporaneously with the Motion was the Declaration of Richard S. Snyder (**Snyder**
11 **Declaration**) in support thereof, attaching Exhibits A-F, in support of the Motion:

12 4. Exhibit A to the Snyder Declaration is a true and correct copy of the Deposition of
13 Masashi Muramatsu, designated as Highly Confidential.

14 5. Exhibit B to the Snyder Declaration is a true and correct copy of the Deposition of
15 Ayumu Kinoshita, designated as Highly Confidential.

16 6. Exhibit C to the Snyder Declaration is a true and correct copy of excerpts of the
17 Deposition of Chih Chun-Liu, which were initially introduced into this action as Exhibit K to the
18 Loh Declaration, Docket No. 2340, as Highly Confidential.

19 7. Exhibit D to the Snyder Declaration is a true and correct copy of a report of the
20 Philips/Matsushita 1st Global Meeting, which was initially introduced in this action as Exhibit O
21 to the Loh Declaration, Docket No. 2340, as Confidential.

22 8. Exhibit E to the Snyder Declaration is a true and correct copy of Samsung SDI
23 Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories,
24 Nos. 4 and 5, Exhibit E to the Loh Declaration, Docket No. 2340, designated as Confidential.

25 9. Exhibit F to the Snyder Declaration is a true and correct copy of excerpts from the
26 Deposition of Sheng-Jen Yang, which were initially introduced into this action as Exhibit F to the
27 Loh Declaration, Docket No. 2340, as Highly Confidential.

10. On June 18, 2008, the Court approved a Stipulated Protective Order in this matter (Dkt. No. 306) (**Protective Order**). The Protective Order requires that a party may not file any confidential material in the public record (§ 10). The Protective Order provides that any party seeking to file any confidential material under seal must comply with Civil Local Rule 79-5 (*id.*).

11. Exhibits A-B (collectively **Confidential Exhibits**) are the deposition transcripts respectively of Masashi Muramatsu and Ayumu Kinoshita, designated by the Panasonic Defendants as Highly Confidential.

12. Exhibits C-F (collectively the **Loh Exhibits**) were submitted as Exhibits E, F, K, and O to the Declaration of Vincent S. Loh in Support of Plaintiffs Best Buy, Target, and Tech Data's Consolidated Opposition to Defendant Beijing Matsushita Color CRT Co., Ltd.'s Motion to Dismiss Certain Direct Action Purchase Complaints. The Court previously GRANTED the Motion to Seal the Loh Exhibits. *See* Order Granting Plaintiffs Best Buy, Tech Data, and Target's Administrative Motion to Seal Pursuant to Civil Local Rules 7-11 and 79-5 dated February 12, 2014, Dkt. No. 2383 (**Sealing Order**).

13. BMCC seeks to submit the above material under seal in good faith in order to comply with the Sealing Order, the Protective Order and the applicable Local Rules.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was signed this 7th day of November, 2014, in Washington, D.C.

Freshfields Bruckhaus Deringer US LLP

By: 

Richard Snyder (*pro hac vice*)
Freshfields Bruckhaus Deringer US LLP
Email: richard.snyder@freshfields.com
700 13th Street, NW, 10th Floor
Washington, DC 20005
Telephone: 202 777 4500
Facsimile: 202 777 4555

**Counsel to Defendant Beijing Matsushita
Color CRT Co., Ltd.**

DECLARATION OF RICHARD S. SNYDER IN SUPPORT
OF BMCC'S ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5

Master File 07-cv-5944
MDL 1917